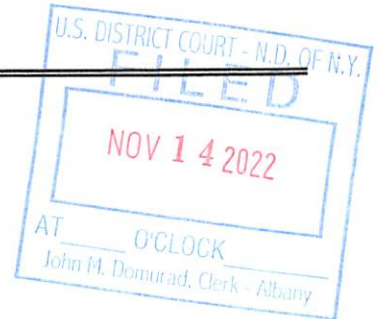


AO 106A (08/18) Application for a Warrant by Telephone or Other Reliable Electronic Means

UNITED STATES DISTRICT COURT

for the
Northern District of New York

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

A UNITED STATES POSTAL PRIORITY MAIL
PACKAGE BEARING TRACKING NUMBER
9505514880122312980870

Case No. 1:22-mj-700-DJS

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A.

located in the Northern District of New York, there is now concealed (identify the person or describe the property to be seized):

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 U.S.C. §§ 841(a), 846	Distribution of a Controlled Substance; Conspiracy to Commit a Title 21 Offense

The application is based on these facts:
See attached affidavit.

☒ Continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Michael R. Boyle, U.S. Postal Inspector

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone _____ (specify reliable electronic means).

Date: 11/14/2022

City and state: New York

Judge's signature

Hon. Daniel J. Stewart, U.S. Magistrate Judge

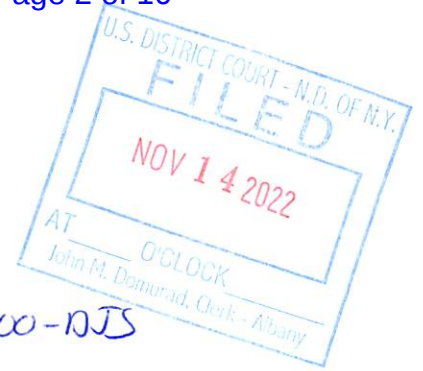
Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR NORTHERN DISTRICT OF NEW YORK

IN THE MATTER OF THE SEARCH OF A
UNITED STATES POSTAL PRIORITY
MAIL PACKAGE BEARING TRACKING
NUMBER 9505514880122312980870

Case No. 1:22-mj-700-DJS

Filed Under Seal



AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, **Michael R. Boyle**, being duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been a United States Postal Inspector with the U.S. Postal Inspection Service (USPIS) since May 2019, and I am currently assigned to the USPIS' Boston Division. Prior to becoming a Postal Inspector, I was a Police Officer with the Town of Amherst, Massachusetts. I have a bachelor's degree in Criminal Justice from Westfield State University. In 2015, I graduated from the Western Massachusetts Police Academy. I graduated from the U.S. Postal Inspection Service Federal Law Enforcement Training Academy in May 2019 and received training in investigating the use of the U.S. Mail to transport controlled substances. Based upon my training in law enforcement and the training and experience of Inspectors more senior to me, I am familiar with the methods and techniques used by traffickers of illegal narcotics and pharmaceuticals to transport controlled substances and the proceeds related to the sale of controlled substances via the U.S. Mail and avoid detection by the USPIS.

2. I am an "investigative or law enforcement officer" of the United States within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 21, United States Code, Section 801, *et. seq.*, and Title 18, United States Code, Section 2516 which relate to the U.S. Mail.

3. The information contained in this affidavit is based on my knowledge and on observations made by me during this investigation, on information conveyed to me by other law enforcement officers, and on my examination and review of physical evidence obtained during the investigation. I have also consulted with several other Inspectors and narcotics law enforcement officers who have extensive knowledge and experience with regard to the trafficking of controlled substances and the laundering of currency obtained from the sale of controlled substances.

4. Because this affidavit is being submitted for the limited purposes of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts which I believe establish a violation of federal law, and that evidence of that crime is presently at the location to be searched.

5. Based on the following, there is probable cause to believe that the package described below contains instrumentalities, fruits, contraband, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) [Distribution of a controlled substance] and 846 [Conspiracy to Commit a Title 21 Offense], by persons unknown.

IDENTIFICATION OF THE PROPERTY TO BE SEARCHED

6. I make this affidavit in support of a Search Warrant for the following item: A United States Postal Service Priority Mail package numbered 9505514880122312980870 addressed to "Brittany Fiorino, 25 Corliss Ave, Greenwich, NY 12834" with a return address of "Western Reprographics, 1439 N. Highland Ave #200, Los Angeles, CA 90028" (the "Suspect Package"). The Suspect Package was accepted by the United States Postal Service (USPS) on November 8, 2022, in Los Angeles, California for mailing. The Suspect Package was sent via USPS Priority Mail. Postage to mail the Suspect Package was paid for in cash in the amount of \$17.05. The Suspect Package weighs approximately 2 pounds, 14.6 ounces. The Suspect Package is currently

located at the U.S. Post Office at 400 Broadway, Troy, NY 12180, which is in the Northern District of New York. A photo of the Suspect Package is seen below:



PROBABLE CAUSE

7. On November 9, 2022, the Suspect Package was encountered during routine profiling of inbound parcels from source areas to the Northern District of New York. The Suspect Parcel was paid for in cash, which allows the sender to avoid providing any means of identification, such as a credit card or debit cards, when sending suspected controlled substances. Based on my training and experience, drug traffickers often pay in cash to conceal their identity when mailing packages containing controlled substances.

8. The Suspect Package is also heavily taped. Through my training and experience, I am aware that individuals who traffic controlled substances through the mail often secure the

seams with extra tape in an attempt to mask any potential odor created by controlled substances, as well as to help ensure that the package does not break open during transportation to its destination. The Suspect Package is taped in a manner that is consistent with parcels that contain controlled substances.

Examination of the Label Information

8. Utilizing public resources such as Google Maps, USPS Records and CLEAR, a subscription-based records database utilized by law enforcement, I learned the following:

- a. The Suspect Package is addressed to “Brittany Fiorino.” I am able to locate an individual by this name that is associated with “25 Corliss Ave, Greenwich, NY 12834” in any law enforcement or public database.
- b. The business name that is associated with the return address on the Suspect Package is “Western Reprographics.” I am unable to locate a business by this name that is associated with “1439 N. Highland Ave #200, Los Angeles, CA 90028” in any law enforcement or public database.
- c. “1439 N. Highland Ave, Los Angeles, CA 90028” is associated with the “Highland Copy Center.” According to the company’s website,¹ customers can rent private mailboxes where they can receive their mail and packages from all major shipping carriers.

9. Through my training and experience, and that of my co-workers, I am aware that drug traffickers often utilize the United States Mail to transport and distribute controlled substances. Inspectors in my office have been involved in numerous investigations related to the transportation of controlled substances, including but not limited to, cocaine, marijuana, heroin,

¹ See <http://www.highlandcopycenter.com/>

methamphetamine, prescription medication, and synthetic substances, all shipped via the United States Mail.

10. Through my training and experience, and discussions with Inspectors who routinely work investigations related to the trafficking of controlled substances via the U.S. Mail, I am aware that California is a known source area for controlled substances.

11. I am also aware that packages later discovered to contain controlled substances often use fictitious information as it relates to the sender or recipient's name, while utilizing a legitimate address. This provides individuals associated with the package the ability to disguise their relation to the package but still permit the package to be delivered to a valid address.

12. Also, based on my training and experience and discussions with my more senior coworkers, I am aware that drug traffickers who utilize the United States Mail to transport and distribute controlled substances often use legitimate names and business names to avoid being detected by law enforcement. Often, drug traffickers will utilize the name of someone who used to reside at the address in order to disguise their relationship to the package.

13. Based on my training and experience and discussions with more senior coworkers, I am aware that drug traffickers who utilize the United States Mail to transport and distribute controlled substances often ship controlled substances with packaging, shipping records, notes and correspondence, and evidence tending to identify the source of the package and the intended recipient of the parcel.

Canine Examination of the Suspect Package

14. Based on these facts, your affiant requested that Albany County Sheriff's Deputy Brandon Souza and his K-9 partner Link assist with an examination of the Suspect Package. K-9 Link and Deputy Souza are certified by the State of New York Division of Criminal Justice

Services Municipal Police Training Council. K-9 Link is certified to detect the presence of the odor of Marijuana, Cocaine, Crack Cocaine, Methamphetamines, MDMA, and Heroin. I was informed by Deputy Souza that K-9 Link has been previously reliable in the detection of narcotics and has had narcotics seizures. K-9 Link is currently certified by the State of New York Division of Criminal Justice Services Municipal Police Training Council, and is certified until February 2023.

15. On November 10, 2022, your affiant met Deputy Souza and K-9 Link at the Post Office located at 400 Broadway, Troy, NY. At that time, I hid the Suspect Package in an area in the absence of K-9 Link. The Suspect Package was placed amongst several other packages and containers that were similar in size and shape. K-9 Link is trained to passively alert to suspected controlled substances. K-9 Link located the Suspect Package and laid down next to the Suspect Package. Deputy Souza informed me that K-9 Link's behavior was consistent with the manner in which he is trained to alert for the presence of the odor of controlled substances.


16. Your affiant is aware, through experience and conversations with K-9 handlers, that individuals who regularly handle controlled substances often leave the scent of controlled substances on the box, packaging materials, and other package contents they handle. Packaging materials are also often stored near the controlled substances, transferring the odor of the controlled substance to the packaging materials, contents, and parcel. Narcotics detection K-9s receive training to alert to the odor of controlled substances, and not in relation to any specific quantity.

CONCLUSION

17. Based upon the above information, I believe that the Suspect Package contains instrumentalities, fruits, contraband, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) [Distribution of a controlled substance] and 846 [Conspiracy to Commit a Title

21 Offense], by persons unknown, and I request that a search warrant for the Suspect Package be issued.

Attested to by the affiant:



Michael R. Boyle
United States Postal Inspector

I, the Honorable Daniel J. Stewart, United States Magistrate Judge, hereby acknowledge that this affidavit was attested to by the affiant by telephone on November 14, 2022 in accordance with Rule 41 of the Federal Rules of Criminal Procedure.



Honorable Daniel J. Stewart
United States Magistrate Judge

ATTACHMENT A

Property to be Searched

The property to be searched is A United States Postal Service Priority Mail package numbered 9505514880122312980870 (the "Suspect Package"), which is addressed to "Brittany Fiorino, 25 Corliss Ave, Greenwich, NY 12834" with a return address of "Western Reprographics, 1439 N. Highland Ave #200, Los Angeles, CA 90028." The Suspect Package was accepted by the United States Postal Service (USPS) on November 8, 2022, in Los Angeles, California for mailing. The Suspect Package is seen below:



The Suspect Package is located at the U.S. Post Office at 400 Broadway, Troy, NY 12180.

ATTACHMENT B

Property to be seized

The property to be seized is all instrumentalities, fruits, contraband, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) [Distribution of a controlled substance] and 846 [Conspiracy to Commit a Title 21 Offense], by persons unknown, including:

- a. Controlled substances;
- b. U.S. currency;
- c. Packaging, inside or affixed to the package described in Attachment A;
- d. Shipping records, inside or affixed to the package described in Attachment A;
- e. Notes and correspondence, inside or affixed to the package described in Attachment A;
- f. Evidence indicating the identity of the source of packages described in Attachment A; and
- g. Evidence indicating the identity of the intended recipient of the package described in Attachment A.
- h. Evidence indicating the sender's state of mind as it relates to the crimes under investigation.
- i. Records of customers or transaction histories.